

DECLARATION OF JACQUELINE BROWN

I, Jaqueline Brown, hereby declare as follows:

1. I am the Director & Associate Professor Immigration & Deportation Defense Clinic University of San Francisco School of Law in San Francisco, CA as well as the Legal Director of the Sonoma Secure Families Collaborative in Healdsburg, CA. I make this declaration in support of Plaintiffs' Emergency Motion for a Temporary Restraining Order and Preliminary Injunction. I have personal knowledge of the matters stated herein.
2. I represent N.M., who is the person identified in the email correspondence attached hereto. N.M. is from Myanmar. He has a final removal order from Omaha, Nebraska issued in August 2023. N.M. is a member of the certified class in *D.V.D. v. DHS*, No. 1:25-cv-10676-BEM (D. Mass). He was one of the men whom the Department of Homeland Security (DHS) previously attempted to deport to Libya on May 7, 2025.
3. My representation of N.M. began after he was initially informed by DHS that we would be deported to Libya. I, along with a group of other attorneys agreed to take on representation of the Libya group. Because one of those attorneys, Jonathan Ryan, is based in Texas, he filed a Notice of Appearance (Form G-28) on behalf of the men so that he could meet with them in person.
4. Mr. Ryan met with N.M. on Friday May 16, 2025. At that meeting, Mr. Ryan explained to N.M. my willingness to represent him pro bono and he agreed. Mr. Ryan has told me that N.M. has limited English proficiency and that his best language is Karen. Mr. Ryan also told me that he explained to the group that they had the right to express a fear of return to a third country.
5. On May 17, 2025 at 4:49 PM CT, Mr. Ryan received a notification via ICE's e-File Portal that N.M. had been transferred from the South Texas Detention Center to the Port Isabel

Detention Center, in Port Isabel, Texas. On May 19, 2025 at 4:44 CT, Mr. Ryan received an email from a Supervisory Detention and Deportation Officer at the Harlingen Field Office, Port Isabel Detention Center providing a document that the officer alleged had been served on N.M. The document stated that it was a “Notice of Removal” to inform N.M. that ICE intended to remove him to South Africa. The certificate of service stated that the contents of the notice were read to N.M. in English without an interpreter at 10:59 and that N.M. refused to sign the document.

6. Mr. Ryan has informed me that, approximately ten minutes later he received a notification that the sender sought to recall the email message attaching the notice of removal to South Africa.

7. Later that day, at 6:35 PM CT, Mr. Ryan received a second email from the Supervisory Detention and Deportation Officer, with a document that the officer alleged had been served on N.M. The attachment, utilizing the same form as was used for the notice to South Africa, stated that it was a “Notice of Removal” to inform N.M. that ICE intended to remove him to *South Sudan*. The certificate of service stated that the contents of the notice were read to N.M. in English without an interpreter at “1748” and that N.M. refused to sign the document.

8. On the evening of May 19, 2025, I contacted Plaintiffs’ counsel to inform them that N.M. received the notice of removal to South Sudan. At that point, I had scheduled a video meeting with N.M. at 9 a.m. CT the next day (May 20).

9. Today, I checked the online ICE detainee locator and saw that N.M. was no longer in the ICE detainee locator. I then emailed the Port Isabel Detention Center Law Visit email address to confirm whether N.M. was located at the facility.

10. At 8:27 AM PT, a Port Isabel Detention Center Detention Officer responded that N.M. had been removed “this morning.” I emailed to ask to which country N.M. was removed, and the officer responded, at 8:36 AM PT, “South Sudan.”

I declare under penalty of perjury that the foregoing statement is true and correct to the best of my own personal knowledge. Executed this 20th day of May 2025 at San Francisco, California.



Jaqueline Brown
Declarant

From: [Jonathan Ryan](#)
To: [Kristin Macleod-Ball](#)
Subject: Fwd: Service of Documents
Date: Tuesday, May 20, 2025 12:22:10 PM
Attachments: [Notice of Removal to Third Country.pdf](#)

FYI

From: [REDACTED] <[REDACTED]@ice.dhs.gov>
Date: Mon, May 19, 2025 at 4:44 PM
Subject: Service of Documents
To: jdr@jonathandryanlaw.com <jdr@jonathandryanlaw.com>
Cc: [REDACTED] <[REDACTED]@ice.dhs.gov>, [REDACTED]
<[REDACTED]@ice.dhs.gov>

Good afternoon,

This email is intended to notify to the Law Office of Jonathan Ryan of the attached document served to your client [REDACTED].

Thank you,

[REDACTED]
Supervisory Detention and Deportation Officer
Harlingen Field Office, Port Isabel Detention Center
Enforcement Removal Operations
U.S. Immigration and Customs Enforcement
Office: [REDACTED] Cell: [REDACTED]

U.S. DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Alien Name: _____

Alien Number (A #): _____

Date: May 19, 2025

NOTICE OF REMOVAL

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) intends to remove you to South Africa

CERTIFICATE OF SERVICE

I certify that, on today's date, the contents of this notice were read to _____ in the English language, and I served the alien a copy of this notice in person.

Refused to sign
Signature of Alien

5-19-25
Date of Service

SSA
Title and Signature of ICE Official

1059
Time of Service

N/A
Name or Number of Interpreter (if applicable)

From: [Jonathan Ryan](#)
To: [Kristin Macleod-Ball](#)
Subject: Fwd: Recall: Service of Documents
Date: Tuesday, May 20, 2025 12:21:42 PM

FYI

----- Forwarded message -----

From: [REDACTED] <[REDACTED]@ice.dhs.gov>
Date: Mon, May 19, 2025 at 4:55 PM
Subject: Recall: Service of Documents
To: jdr@jonathandryanlaw.com <jdr@jonathandryanlaw.com>
Cc: [REDACTED] <[REDACTED]@ice.dhs.gov>, [REDACTED]
<[REDACTED]@ice.dhs.gov>

[REDACTED] would like to recall the message, "Service of Documents".

From: [Jonathan Ryan](#)
To: [Kristin Macleod-Ball](#)
Subject: Fwd: Service of Documents
Date: Tuesday, May 20, 2025 12:22:16 PM
Attachments: [Notice of Third Country Removal.pdf](#)

FYI

----- Forwarded message -----

From: [REDACTED] <[REDACTED]@ice.dhs.gov>
Date: Mon, May 19, 2025 at 6:35 PM
Subject: Service of Documents
To: jdr@jonathandryanlaw.com <jdr@jonathandryanlaw.com>
Cc: [REDACTED] <[REDACTED]@ice.dhs.gov>, [REDACTED]
<[REDACTED]@ice.dhs.gov>

Good afternoon,

This email is intended to notify to the Law Office of Jonathan Ryan of the attached document served to your client [REDACTED].

Any questions/concerns please email or call me.

Thank you,

[REDACTED]
Supervisory Detention and Deportation Officer
Harlingen Field Office, Port Isabel Detention Center
Enforcement Removal Operations
U.S. Immigration and Customs Enforcement
Office: [REDACTED] Cell: [REDACTED]

**U.S. DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement**

Alien Name: _____

Alien Number (A #): _____

Date: **May 19, 2025**

NOTICE OF REMOVAL

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) intends to remove you to **South Sudan**.

CERTIFICATE OF SERVICE

I certify that, on today's date, the contents of this notice were read to _____ in the English language, and I served the alien a copy of this notice in person.

REFUSED TO SIGN

Signature of Alien

SDPO

Title and Signature of ICE Official

N/A

Name or Number of Interpreter (if applicable)

5/19/2025

Date of Service

1748

Time of Service

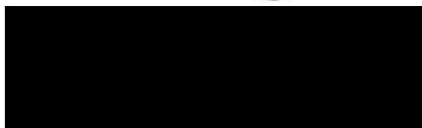
From: [Jacqueline Brown](#)
To: matt@nwirp.org
Cc: [Kristin Macleod-Ball](#); [Trina Realmuto](#)
Subject: Re: Libya now South Sudan (Libya 13)
Date: Tuesday, May 20, 2025 11:39:38 AM

Yes

8:38



Re: [EXTERNAL] VTC/VAV
meeting with client



External

Inbox



PIDC, LawVisit 8:36 AM

to me ▾



South Sudan

Thank you,



Detention Officer
Port Isabel Detention Center
1- 

From: Jacqueline Brown <jmbrown@usfca.edu>
Sent: Tuesday, May 20, 2025 10:33 AM

EXHIBIT F

To: PIDC, LawVisit <lawvisit.pidc@akimaip.com>

Subject: Re: [EXTERNAL] VTC/VAV meeting with client [REDACTED]

To which country?

On Tue, May 20, 2025 at 8:27 AM PIDC, LawVisit <LawVisit.PIDC@akimaip.com> wrote:

He was removed this monrning

Thank you,

[REDACTED]



On Tue, May 20, 2025 at 8:35 AM Matt Adams <matt@nwirp.org> wrote:

Do we have your permission to include this email chain to opposing counsel?

On Tue, May 20, 2025 at 8:34 AM Jacqueline Brown <jmbrown@usfca.edu> wrote:

Yes I already did

On Tue, May 20, 2025 at 8:33 AM Matt Adams <matt@nwirp.org> wrote:

Can you respond and ask for confirmation to where he was removed to?

On Tue, May 20, 2025 at 8:31 AM Jacqueline Brown <jmbrown@usfca.edu> wrote:

Replied to the email, did not receive a response and I learned that [REDACTED] was removed this morning!

8:29



Re: [EXTERNAL] VTC/VAV
meeting with client



[REDACTED] External Inbox



PIDC, LawVisit 8:27 AM



to me ▾

He was removed this monrning

Thank you.

Detention Officer
Port Isabel Detention Center

1- [REDACTED]

From: Jacqueline Brown <jmbrown@usfca.edu>

Sent: Tuesday, May 20, 2025 10:19 AM

To: PIDC, LawVisit

<LawVisit.PIDC@akimaip.com>

Subject: Re: [EXTERNAL] VTC/VAV meeting with
client [REDACTED]

Can you confirm that Mr. [REDACTED] is still in
Port Isabel? He is no longer in the detainee
locator system.

Jacqueline M. Brown

Director & Associate Professor

Immigration & Deportation Defense Clinic

University of San Francisco School of Law

[2130 Fulton Street | San Francisco, CA 94117](#)



On Mon, May 19, 2025 at 6:43 PM Matt Adams <matt@nwirp.org> wrote:

[REDACTED]

On Mon, May 19, 2025 at 6:36 PM Jacqueline Brown <jmbrown@usfca.edu> wrote:

Good evening,

Wanted to let you all know that [REDACTED] received a notice today (which he refused to sign and is attached) that he would be sent to South Sudan. Email was sent to Jonathan Ryan because he had filed his G28 first and visited the whole group in person last week. [REDACTED] was moved this weekend to Port Isabel. I am meeting with him on Wednesday 9am video. Notice came from:

[REDACTED]

I will respond to the email requesting an RFI, but is there anything else I should be stating at this point?

Thank you-

Jacqueline

Jacqueline M. Brown

Director & Associate Professor

Immigration & Deportation Defense Clinic

University of San Francisco School of Law

[2130 Fulton Street | San Francisco, CA 94117](#)

Legal Director, Sonoma Secure Families Collaborative

[449 Hudson Street | Healdsburg, CA 95448](#)

direct phs. 415-422-3330 | 707-473-8932

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Northwest Immigrant Rights Project

615 Second Ave., Ste. 400

Seattle, WA 98104

(206) 957-8611

(206) 587-4025 fax

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